



Avraham C. Moskowitz  
AMoskowitz@mb-llp.com

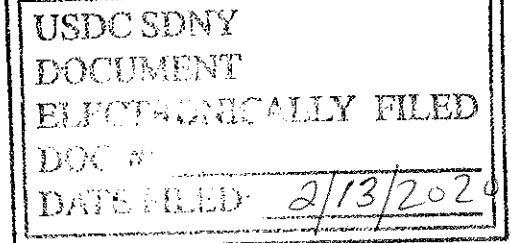
345 Seventh Avenue, 21<sup>st</sup> Floor  
New York, NY 10001  
Phone: (212) 221-7999  
Fax: (212) 398-8835

**MEMO ENDORSED**

February 11, 2020

**VIA ECF**

Hon. Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007



Re: United States v. Joelsy Abreu-Sarit, et al.  
19 Cr. 367 (DLC))

Dear Judge Cote:

This letter is respectfully submitted on behalf of the defendant, Juan Carlos Rosario-Sarit, to request a modification of his bail conditions to allow him to travel to Carbon County, Pennsylvania to resolve criminal charges pending against him in that jurisdiction.

As Your Honor may recall, on December 30, 2019, Mr. Rosario-Sarit entered a guilty plea to the lesser included offense charged in Count 1 of the indictment against him. In continuing the defendant's bail pending sentencing, the Court directed that Mr. Rosario-Sarit make arrangements to appear in Carbon County, Pennsylvania to deal with the charges filed against him and the bench warrant issued for his failure to appear for a court appearance scheduled in June 2019, of which the defendant was unaware.

Since his guilty plea, I have been in contact with the Carbon County District Attorney's Office and Public Defenders Office. The prosecution has agreed to vacate the bench warrant against Mr. Rosario-Sarit when he next appears in court in that jurisdiction. The District Attorney's Office has also made an offer to resolve the case without a trial. Because I am not admitted to practice in Pennsylvania, I am not able to advise Mr. Rosario-Sarit about the plea offer. To assist him, I contacted the Public Defender's Office and helped Mr. Rosario-Sarit to complete an application for the appointment of a Public Defender to represent him. In order for him to have a Public Defender appointed, he must appear, in person, at the Public Defender's Office in Jim Thorpe, Pennsylvania. Once counsel is appointed to represent him, I am confident that the matter in Carbon County can be resolved expeditiously.

Hon. Denise L. Cote  
February 11, 2020  
Page 2

In light of the above, it is respectfully requested that the Court modify Mr. Rosario-Sarit's bail conditions to allow him to travel to Carbon County, Pennsylvania for the purpose of having counsel appointed, meeting with counsel and appearing in Court to resolve the charges pending against him. Because the dates for those appointments have not yet been set, it is requested that Mr. Rosario-Sarit be allowed to travel upon notification to Pre-trial Services of the dates of his appointments and court appearances and his travel plans.

I have spoken to AUSA Juliana Murray, who advised me that the Government has no objection to the requested modification.

Thank you in advance for your consideration of this request.

Respectfully submitted,

*Avraham C. Moskowitz*

Avraham C. Moskowitz

ACM:bgb

cc: AUSA Juliana Murray (by e-mail)

*Granted.  
Denise Cote  
2/13/20*